

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

LIBERTARIAN PARTY OF ERIE COUNTY,  
MICHAEL KUZMA, RICHARD COOPER, GINNY  
ROBER, PHILIP M. MAYOR, MICHAEL  
REBMANN, EDWARD L. GARRETT, DAVID  
MONGIELO, JOHN MURTARI, and WILLIAM A.  
CUTHBERT,

15-cv-00654-FPG

Plaintiffs,

- against -

ANDREW M. CUOMO, individually and as Governor  
of the State of New York; ERIC T. SCHNEIDERMAN,  
individually and as Attorney General of the State of  
New York; JOSEPH A. D'AMICO, individually and as  
Superintendent of the New York State Police;  
MATTHEW J. MURPHY, III, individually and as  
Niagara County pistol permit licensing officer; DENNIS  
M. KEHOE, individually and as Wayne County pistol  
permit licensing officer; and M. WILLIAM BOLLER,  
individually and as Erie County pistol permit licensing  
officer,

Defendants.

**REPLY DECLARATION OF WILLIAM J. TAYLOR, JR.**

WILLIAM J. TAYLOR, JR., an attorney duly admitted to practice before this Court,  
declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an Assistant Attorney General in the office of ERIC T. SCHNEIDERMAN,  
Attorney General of the State of New York. This Office represents defendants Andrew M.  
Cuomo, Governor of the State of New York; Eric T. Schneiderman, Attorney General of the  
State of New York; Joseph A. D'Amico, Superintendent of the New York State Police; the  
Honorable Matthew J. Murphy III, Niagara County Court Judge; the Honorable Dennis M.  
Kehoe, Wayne County Judge and Acting New York State Supreme Court Justice; and the

Honorable M. William Boller, Judge of the New York State Court of Claims and Acting New York State Supreme Court Justice (collectively, the “Defendants”) in the above-captioned action.<sup>1</sup>

2. I submit this reply declaration in support of the Defendants’ motion, pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, to dismiss plaintiffs’ Amended Complaint, dated December 23, 2015, for the limited purpose of providing the Court with a true and accurate copy of the following document referenced in the accompanying Reply Memorandum of Law in Further Support of Defendants’ Motion to Dismiss the Amended Complaint, dated June 24, 2016:

Exhibit	Exhibit Description
M	Order Granting Stay Pending Appeal, <i>Grace v. District of Columbia</i> , No. 16-7067 (D.C. Cir. June 8, 2016).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: New York, New York  
June 24, 2016

/s/ William J. Taylor, Jr.  
William J. Taylor, Jr.  
Assistant Attorney General

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<sup>1</sup> As of June 9, 2016, the Superintendent of the New York State Police is George P. Beach II. With respect to Plaintiffs’ official-capacity claims only, he should be substituted for Joseph A. D’Amico as a defendant. Fed. R. Civ. P. 25(d).